DOMINION ENERGY SOUTH CAROLINA, INC.'S

RESPONSE TO LATE FILED EXHIBIT NO. 7 OF ANNA SOMMER

DOCKET NO. 2019-226-E

On October 21, 2020, Anna Sommer submitted to the Commission on behalf of the South Carolina Coastal Conservation League ("CCL") and the Southern Alliance for Clean Energy ("SACE") Late Filed Exhibit No. 7 in the above-captioned proceeding. In this Late Filed Exhibit, Ms. Sommer updated Table 1 from her prefiled direct testimony ("Updated Table 1"), which was her assessment of whether the 2020 IRP satisfied each of the requirements of S.C. Code Ann. § 58-37-40, based on the IRP Supplement that Dominion Energy South Carolina, Inc. ("DESC") prepared and submitted with DESC witness Eric Bell's prefiled rebuttal testimony. The Updated Table 1 is similar to the original Table 1, except Ms. Sommer has used the opportunity to add an additional column "explaining how DESC could amend its IRP to rectify any deficiencies and make its IRP compliant with the EFA."

The criticisms Ms. Sommer makes of the IRP in her Updated Table 1 follow the general course of her testimony, which is to inject requirements into the IRP process that are not mentioned or delineated in the statute or prior orders of the Commission and then to opine that because those requirements are not met, the IRP is legally deficient. Many of the alleged 'deficiencies' are recommendations for changes in the IRP process or matters where SACE and CCL have specific preferences for how modeling should be performed or information presented. DESC will certainly consider these recommendations and preferences in the future, but by law, DESC was in no way obligated to include the level of detail or information in its IRP that Ms. Sommer contends it was. In his direct prefiled and rebuttal testimony, Company witness Eric Bell provided a step by step

analysis of each requirement contained in the statute and how each was specifically satisfied in the IRP. In addition, ORS's expert witness, Mr. Lane Kollen, specifically testified that the IRP as supplemented meets all requirements of the statute. Nevertheless, DESC offers the following assessment in response, which indicates how each and every requirement of S.C. Code Ann. § 58-37-40 was satisfied in DESC's 2020 IRP and IRP Supplement.

Act No. 62 § 58-37-40	**Requirement**	**2020 IRP Section Satisfying Requirement**	**Explanation of How IRP Requirement Was Satisfied**
(B)(1)(a)	a long-term forecast of the utility's sales and peak demand under various reasonable scenarios;	I.A I.B	Section I.A provides a long-term forecast for sales and peak demand, under various reasonable scenarios, as the statute requires. In addition, Section I.B provides an analysis of the sensitivity of each of the eight resource plans modeled under various reasonable sales and peak demand scenarios. The medium case reflects an annual growth rate of 0.5% in energy sales and a firm peak demand growth rate of 0.7% for both summer and winter. High and low growth case scenarios were also modeled based on the load impacts from failed DSM efforts or DSM results that substantially exceed current program targets.
(B)(1)(b)	the type of generation technology proposed for a generation facility contained in the plan and the proposed capacity of the generation facility, including fuel cost sensitivities under	II.B.5.c	Ms. Sommer agrees that the types of generation technology proposed for a generation facility were contained in the IRP. Fuel sensitivities are explicitly presented and discussed in the IRP Supplement in Section

	various reasonable scenarios;		II.B.5.c.iv. As DESC's thermal generation has become increasingly dependent on natural gas generation, the principal concern of fuel price sensitivity is future natural gas prices. Base, high and low natural gas price forecasts were modeled as sensitivities for all resource plans.
(B)(1)(c)	projected energy purchased or produced by the utility from a renewable energy resource;	II.B.3.c	Section II.B.3.c shows the levels of energy provided by renewable energy resources for each resource plan modeled.
(B)(1)(d)	a summary of the electrical transmission investments planned by the utility;	III	Section III delineates each electric transmission project planned by the utility with a projected completion date.
(B)(1)(e)	several resource portfolios developed with the purpose of fairly evaluating the range of demand-side, supply-side, storage, and other technologies and services available to meet the utility's service obligations. Such portfolios and evaluations must include an evaluation of low, medium, and high cases for the adoption of renewable energy and cogeneration, energy efficiency, and demand response measures, including consideration of the following: (i) customer energy efficiency and	II.B.5.c II.B.3.d	The 2020 IRP and IRP Supplement developed eight resource portfolios that fairly evaluated the range of demand-side, supply-side, storage, and other technologies and services that are available to meet the utility's service obligations. Each was tested for its sensitivity against a range of price, environmental, and DSM-based load variables. The eight plans were studied using • three natural gas price scenarios ("sensitivity analyses related to fuel costs"); • two CO_2 cost scenarios ("sensitivity analyses related to environmental regulations"); and • three DSM cases ("customer energy

	demand response programs; (ii) facility retirement assumptions; and (iii) sensitivity analyses related to fuel costs, environmental regulations, and other uncertainties or risks;		efficiency and demand response programs"). Cogeneration was evaluated in Section II.B.3.d. Facility retirement assumptions were specified in Section II.B.5.c ("Wateree and Williams Stations are assumed retired when they reach their end of life, which is years 2044 and 2047 respectively….").
(B)(1)(f)	data regarding the utility's current generation portfolio, including the age, licensing status, and remaining estimated life of operation for each facility in the portfolio;	II.B.1 II.B.3 II.B.4.a	DESC's current generation portfolio was set forth in Section II.B.1. Additionally, Section II.B.4.a provides data regarding DESC's 2019 resource mix and a table showing DESC's generation portfolio, including the In-Service Date ("age") and probable retirement date ("remaining estimated life") for each facility in the portfolio.
(B)(1)(g)	plans for meeting current and future capacity needs with the cost estimates for all proposed resource portfolios in the plan;	II.B.5.c	Section II.B.5.c explicitly explains how DESC planned to meet the base resource need. Ms. Sommer does not seem to disagree that DESC met this requirement. She suggests alternative ways to present the data, and DESC is open to consider these suggestions in future IRPs.
(B)(1)(h)	an analysis of the cost and reliability impacts of all reasonable options available to meet projected energy and capacity needs; and	II.B.5.c	Each of the eight resource plans considered in the IRP was modeled to show levelized cost to customers and reliability based on historical and engineering data concerning the

			reliability of each of the specific generation resources contained in each resource plan. The capacity margins under each plan were established to ensure the generation system's ability to meet customers' demands reliably and efficiently given the reliability impacts of the resources considered. Act No. 62 does not require any rate or bill impacts to be analyzed or included in an IRP.
(B)(1)(i)	a forecast of the utility's peak demand, details regarding the amount of peak demand reduction the utility expects to achieve, and the actions the utility proposes to take in order to achieve that peak demand reduction.	I.A II.A.1 II.A.2	Ms. Sommer agrees that the 2020 IRP contains a forecast of DESC's peak demand. Details regarding peak demand reduction are set forth in Sections II.A.1 and II.A.2. Section II.A.2 sets forth DESC's load management programs. The purpose of these programs is specifically to reduce peak demand.
(B)(2)	An integrated resource plan may include distribution resource plans or integrated system operation plans.	II.A.2 II.B.2	Inclusion of distribution resource plans or integrated system operations plans is optional. However, DESC included information on distribution resource plans in Section II.B.2, titled "Distribution Resource Plans."